

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**SECURITIES AND EXCHANGE
COMMISSION**

Plaintiff,

v.

BONAN HUANG, et al.

Defendants.

Case No. 2:15-cv-00269-MAK

**SECURITIES AND EXCHANGE COMMISSION'S
NOTICE OF MOTION AND MOTION FOR SANCTIONS**

Plaintiff Securities and Exchange Commission, by and through its undersigned counsel and pursuant to Federal Rule of Civil Procedure 37(b)(2), hereby moves this Court for sanctions in light of defendants' continued refusal to abide by this Court's orders requiring them to sit for deposition. Specifically, the Commission respectfully requests that the Court: (1) deem defendants to have asserted their Fifth Amendment rights against self-incrimination in refusing to answer any question the Commission could have posed to them at a deposition; and (2) preclude defendants from offering any evidence in this matter. The parties met and conferred concerning these matters and, after reasonable efforts, have been unable to resolve this dispute. The accompanying memorandum in support is incorporated into this notice of motion and motion as if fully set forth herein.

Dated: October 8, 2015

Respectfully submitted,

BY: /s/ Christopher R. Kelly
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